



NORLITE CORPORATION

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November 12, 2012

Karen M. Gaidasz, CPESC
Environmental Analyst
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 10/24/12- 11/08/12
Kiln 2: 10/24/12- 11/08/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 10/24/12 thru 11/08/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. A portion of the cutoffs were associated with wind gusts experienced during and after the storm Sandy came through the area. The wind gusts affected the reference pressure and decreased the differential pressure in the chamber system. A portion of the rear chamber cutoffs were also associated with pressure pulses in the kiln system from sudden fuel flow changes from using valves to control flow rate. Norlite personnel have closed the fresh air in-take valve to improve efficiency of the draft system for the rear chamber system. Kiln 2 is also down for power delivery issues so a maintenance cycle will be conducted from 11/12/12 to the afternoon of 11/14/12. During that time the rear seal system of the kiln will be evaluated to ensure the system is functioning properly. Norlite and its consultant will continue to evaluate each cutoff in an effort to reduce the number of cutoffs which occur.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvraken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

DCL: 2410



NORLITE CORPORATION

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments
Tita LaGrimas, Tradebe w/attachments



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
10/24/12 - 11/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/25/2012	4:18:56	10/25/2012	6:24:56	2:06:00	157	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Rinsed Mist Pad	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
10/28/2012	6:58:47	10/28/2012	10:26:19	3:27:32	158	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Rinsed Mist Pad	Stack Gas Flow Rate	Span	Adjusted Fuel Flow
11/1/2012	17:00:27	11/1/2012	17:10:06	0:09:39	159	Malfunction	The Lime Feeder Stopped Which Caused the Lime Feed Rate HRA to Drop	Lime Feed Rate	Opl	Switched Feeder
11/3/2012	18:08:16	11/3/2012	18:09:41	0:01:25	160	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Pressures Which Caused the Differential Pressure at the Front Kiln Hood and Rear Chamber System to Decrease and Cause A Simultaneous Front and Back Chamber Pressure Cutoff to Occur	Back Chamber Pressure, Simultaneous	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
11/3/2012	18:24:21	11/3/2012	18:24:57	0:00:36	161	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
11/3/2012	18:25:01	11/3/2012	18:25:30	0:00:29	162	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
10/24/12 - 11/08/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
10/27/2012	6:42:12	10/27/2012	6:43:21	0:01:09	369	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
10/27/2012	7:53:00	10/27/2012	7:53:22	0:00:22	370	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
10/27/2012	12:55:54	10/27/2012	12:56:20	0:00:26	371	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
10/27/2012	13:05:26	10/27/2012	13:06:02	0:00:36	372	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
10/27/2012	14:57:52	10/27/2012	14:58:20	0:00:28	373	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
10/29/2012	13:32:50	10/29/2012	13:33:10	0:00:20	374	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Scrubber Recirc. Span	Scrubber Recirc. Rate	Span	Adjusted Scrubber Recirc. Rate
10/30/2012	5:45:58	10/30/2012	6:54:25	1:08:27	375	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur/CO's High Instantaneous Upper Instrument Setpoint Reached	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
10/31/2012	5:02:46	10/31/2012	5:04:50	0:02:04	376	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span	Stack Gas Flow Rate	Span	Adjusted Fuel Flow

11/1/2012	13:43:42	11/1/2012	13:46:29	0:02:47	377	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
11/3/2012	22:09:19	11/3/2012	23:15:22	1:06:03	378	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
11/3/2012	23:31:58	11/3/2012	23:33:37	0:01:39	379	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
11/3/2012	23:37:42	11/3/2012	23:38:22	0:00:40	380	Malfunction	Strong Wind Gusts Out of the Northwest Caused Changes to the Reference Rear Chamber Pressure Which Caused the Differential Pressure at the Rear Chamber System to Decrease and Cause A Rear Chamber System Cutoff to Occur	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted Cooler and ID Fans to Re-Establish Proper Draft
11/5/2012	7:21:55	11/5/2012	7:22:23	0:00:28	381	Malfunction	The Kiln Operator was Controlling LGF Fuel Flow With Valves and High LGF Line Pressure Which Caused a Fuel Flow Surge. This Triggered a Pressure Pulse in the Kiln that Affected the Rear Chamber System / No Visible Emissions	Back Chamber Pressure, 1 Second Delay	Opl	Norlite Personnel Closed the Fresh Air In-Take Valve to Help Improve the Draft System Efficiency
11/7/2012	16:09:32	11/7/2012	20:34:27	4:24:55	382	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Rinsed Mist Pad and Scrubber	Stack Gas Flow Rate	Span	Rinsed Mist Pad and Adjusted Fuel Flow
11/7/2012	20:45:20	11/7/2012	22:34:32	1:49:12	383	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span / Changed Venturi Hose	Stack Gas Flow Rate	Span	Adjusted Fuel Flow